

**From:** [Dawn Frick](#)  
**To:** [Chille DeCastro](#); [Nate Rose](#)  
**Cc:** [Crystal Wegley](#)  
**Subject:** RE: Jose Maria DeCastro v. Pam Wagner, et al.  
**Date:** Tuesday, May 09, 2023 10:02:05 AM  
**Attachments:** [image001.png](#)  
[2016 Revised Discovery Plan \(26f\).pdf](#)

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Mr. DeCastro:

We are happy to schedule a Rule 26(f) conference. Please provide us with times in the next two weeks that work for you and a phone number to reach you and we can confer regarding a discovery plan. Attached is Judge Barrett's Discovery Plan form that we can discuss. If you prefer to exchange suggestions on the Discovery Plan via email, let us know. Thank you.

Dawn M. Frick



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**From:** Chille DeCastro <[iamalaskan@gmail.com](mailto:iamalaskan@gmail.com)>  
**Sent:** Monday, May 08, 2023 9:45 PM  
**To:** Nate Rose <[nrose@sdtlawyers.com](mailto:nrose@sdtlawyers.com)>  
**Cc:** Dawn Frick <[Dfrick@sdtlawyers.com](mailto:Dfrick@sdtlawyers.com)>; Crystal Wegley <[CWegley@sdtlawyers.com](mailto:CWegley@sdtlawyers.com)>  
**Subject:** Re: Jose Maria DeCastro v. Pam Wagner, et al.

My God --

The ineptitude is staggering. You won the DunceCap of the Day award. They're not getting away with it. ESPECIALLY with lawyers like you. You are going to make sure that they won't get away with wrongfully arresting me.

Did you mean to send me interrogatories (especially these ones)? Sending interrogatories without leave of the court before the 26(f) conference is improper, and these questions are mostly requesting things that will be in my initial disclosures or for things wholly inappropriate, especially given my claims. Should I disregard these, or is there any reason why I shouldn't file a motion for sanctions?

I think I'm gonna file a motion for sanctions. I won't rest until my good name is cleared.

Regards,  
Jose DeCastro

Thank you,  
Chille DeCastro

On Mon, May 8, 2023 at 10:40 AM Nate Rose <[nrose@sdtlawyers.com](mailto:nrose@sdtlawyers.com)> wrote:

Mr. DeCastro,

Following up on the email below, I have your responsive deadline to our discovery requests calendared on May 5, 2023. As such, can you please advise on the status of your discovery responses and when we can expect your responses?

Best regards,

Nate

**Nate Rose, Esq.**  
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**From:** Crystal Wegley <[CWegley@sdtlawyers.com](mailto:CWegley@sdtlawyers.com)>

**Sent:** Wednesday, April 05, 2023 4:50 PM

**To:** [jamalaskan@gmail.com](mailto:jamalaskan@gmail.com)

**Cc:** Dawn Frick <[Dfrick@sdtlawyers.com](mailto:Dfrick@sdtlawyers.com)>; Nate Rose <[nrose@sdtlawyers.com](mailto:nrose@sdtlawyers.com)>

**Subject:** Jose Maria DeCastro v. Pam Wagner, et al.

Good evening,

Attached you will please find Defendants Pam Wagner, Brad Spoljaric, Chance Blankenship, Evan McNight, Robert Fouch, and the City of Ironton, Ohio's First Set of Interrogatories, Request for Production of Documents, and Request for Admission to Plaintiff, Jose Maria DeCastro. I would appreciate it if you would see that the enclosed discovery is responded to in a timely manner. Should you have any question or concerns please feel free to contact our office.

Crystal Wegley  
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